

**510(k) SUMMARY****JUN 04 2014**

510k	SPECIAL
Submitted by	<b>Safe Orthopaedics</b> Parc des Bellevues Allée R. Luxembourg - Le Califormie 95610 Eragny sur Oise - FRANCE Phone: +33 (0) 1 34 21 50 00
Contacts	Pierre DUMOUCHEL - Quality affairs & Regulatory affairs Director <a href="mailto:p.dumouchel@safeorthopaedics.com">p.dumouchel@safeorthopaedics.com</a> Regulatory contact : Isabelle DRUBAIX (Idée Consulting) <a href="mailto:idee-consulting@nordnet.fr">idee-consulting@nordnet.fr</a>
Date Prepared	April 30 <sup>th</sup> 2014
Common Name	Pedicle screw spinal system
Trade Name	SteriSpine <sup>TM</sup> PS Pedicle Screw
Classification Name	Pedicle screw spinal system
Class	III
Product Code	NKB, MNI, MNH, KWP
CFR section	888.3070
Device panel	Orthopedic
Legally marketed predicate devices	Sterispine <sup>TM</sup> PS Pedicle Screw K112453, K121299 and K130632 manufactured by SAFE ORTHOPAEDICS
Indications for use	The SteriSpine <sup>TM</sup> PS system is intended to provide immobilization and stabilization of spinal segments in skeletally mature patients as an adjunct to fusion.  SteriSpine <sup>TM</sup> PS System is intended for posterior, non-cervical pedicle and non-pedicle fixation for the following indications: degenerative disc disease (DDD) (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies); spondylolisthesis; trauma (i.e., fracture or dislocation); spinal stenosis; tumor; pseudoarthrosis; and failed previous fusion.

Description of the device & Technological Characteristics	<p>SteriSpineTMPS system includes Pedicle Screws and Rods. Components of SteriSpineTMPS system are made of Titanium Ta6V Eli grade conforming to ASTM F136. Components added within this submission include multi-axial extended head screws and multi axial extended head cannulated screws <math>\varnothing</math> 5.5, 6.5 and 7.5 (length from 25 to 60 mm), additional lengths for straight and prebent rods <math>\varnothing</math>5.5mm, additional surgical instruments (screw head breakage tip, set screw holder and racking compression pliers, Ratchet module).</p> <p>The SteriSpineTMPS range of products is supplied sterile with a sterile single-use set of surgical instruments.</p>
Discussion of Testing	<p>SteriSpineTMPS conforms to special control established for Pedicle screw spinal system and to « Spinal System 510(k)s - Guidance for Industry and FDA Staff Document » issued on: May 3, 2004.</p> <p>Mechanical testing was conducted per ASTM F1717 Standard Test Methods for Spinal Implant Constructs in a Vertebrectomy Model and ASTM F1798 Standard Guide for Evaluating the Static and Fatigue Properties of Interconnection Mechanisms and Subassemblies Used in Spinal Arthrodesis Implants. Testing according to ASTM F1717 includes Static Compression, Static Torsion and Dynamic Compression. Testing according to ASTM F1798 includes Static slipping, Static bending and Static rotation. Results demonstrate comparable mechanical properties to the predicate device. Cadaver testing performed to validate the instrumentation have been presented.</p> <p>No additional testing has been performed for the added components.</p> <p>Clinical data from a review of the literature has been presented in the class III summary.</p>
Conclusion	<p>The extended range of SteriSpine™PS system is substantially equivalent to its predicate devices SteriSpine™PS system (K112453, K121299 and K130632) in terms of intended use, material, design, mechanical properties and function.</p> <p>Verification Activity and Validation Activity demonstrate that components added to SteriSpine™PS system are substantially equivalent to predicates.</p>



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center – WO66-G609  
Silver Spring, MD 20993-0002

June 4, 2014

Safe Orthopaedics  
Mr. Pierre Dumouchel  
Quality Affairs & Regulatory Affairs Director  
Parc des Bellevues – Allée R. Luxembourg – Bat. Californie  
95610 Eragny sur Oise - FRANCE

Re: K140802  
Trade/Device Name: SteriSpine™ PS Pedicle Screw  
Regulation Number: 21 CFR 888.3070  
Regulation Name: Pedicle screw spinal system  
Regulatory Class: Class III  
Product Code: NKB, MNI, MNH, KWP  
Dated: May 6, 2014  
Received: May 9, 2014

Dear Mr. Dumouchel:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

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If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

<http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

**Ronald P. Jean -S** for

Mark N. Melkerson  
Director  
Division of Orthopedic Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

**Indications for Use**

510(k) Number (if known)  
K140802

Device Name  
SteriSpine™ PS Pedicle Screw

**Indications for Use (Describe)**

The SteriSpine™ PS system is intended to provide immobilization and stabilization of spinal segments in skeletally mature patients as an adjunct to fusion.

SteriSpine™ PS system is intended for posterior, non-cervical pedicle and non-pedicle fixation for the following indications: degenerative disc disease (DDD) (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies); spondylolisthesis; trauma (i.e., fracture or dislocation); spinal stenosis; tumor; pseudoarthrosis; and failed previous fusion.

Type of Use (Select one or both, as applicable)

☒ Prescription Use (Part 21 CFR 801 Subpart D)

☐ Over-The-Counter Use (21 CFR 801 Subpart C)

**PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.**

**FOR FDA USE ONLY**

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)

**Zane W. Wyatt**

**Division of Orthopedic Devices**

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